UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

February 15, 2005

Curtis Frye
U.S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Work Plan - Revision 1 Installation Restoration (IR) Site 08, NUWC Disposal Area Soil Removal Action

Dear Mr. Frye:

I am writing in response to your request for EPA to review the NUWC Disposal Area Soil Removal Action Work Plan. Detailed comments are provided in Attachment A.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the NUWC Disposal Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA

ATTACHMENT A

Page	Comment
p.5, §3	The site description in the Health and Safety Plan includes details regarding the contents of Otto Fuel II, which the Navy uses as fuel for torpedoes and other weapon systems. This fuel is not described in either the Work Plan for this work or the Action Memorandum. Please review the Work Plan and Action Memorandum to verify that the specific information provided regarding Otto Fuel II is not required to be included in these documents. Specifically, the constituent in Otto Fuel II, hydrogen cyanide may be appropriate to describe in the Work Plan.
p. 10, §3.9.1	According to the work plan, some soils that will be excavated will be field screened using PID, FID and visual methods to determine the presence of contamination. However, the document lacks a definitive point at which this screening process will designate that the soils must be evaluated further. The first full paragraph on page 10 should be revised to include the levels at which readings on field equipment will indicate that the soils require further evaluation. Also, the last sentence in this paragraph should specifically state the OSHA requirements for staging of soil piles adjacent to the excavation area. (In other words, "Soil piles must not be staged closer than 2 feet adjacent to the excavated area in accordance with OSHA regulation 29 CFR 1926.651(j)2.")
p. 10, §3.9.1	Use of the "olfactory" sense for classification of soils is not ideal. Employees may be required to wear respiratory protection as required by the Site Specific Health and Safety Plan.
p. 12, §3.12.1	The second sentence in this section should be corrected. The only staged materials that will be used for backfill will be those staged materials that have successfully passed the field screening procedures.
p. 19, §4.2.1	This Work Plan does not include quality assurance information normally necessary for Work Plans in CERCLA documentation for field sampling efforts. However, EPA understands that the only analytical data that will be collected during this Removal Action will be the data required for the waste disposal facility. It is advisable to contact the disposal facility and ensure that all planned quality control documentation will be acceptable. Please verify that all planned analytical procedures required by the disposal facility are acceptable. The next to the last sentence in the first paragraph of

this section indicates that additional analyses may be required ("...and any other disposal facility specific requirements.")

p. 20, §4.2.2 — This section addresses soils and debris to be sampled. The final sentence before the bulleted list should be corrected to read "At a minimum, all *soil* samples will be individually tested..."

p. 15, §4.3.6 HASP — Hydrogen cyanide that has been stored for long periods of time may present an explosive hazard when exposed to air. Precautions related to explosive hazards should be presented in this Health and Safety Plan.

p. 20, §4.4.3.HASP — The occupational exposure value provided for exposure to propylene glycol dinitrate is the NIOSH REL. The text of the first full paragraph on this page describes the provided value as an OSHA PEL. This is incorrect.

p. 29, §8.2 HASP — Please verify that the field screening methods (PID and FID) are capable of measuring airborne concentrations of hydrogen cyanide. Toxicological effects from inhalation may occur when employees are exposed to airborne hydrogen cyanide or propylene glycol dinitrate (the other component of Otto Fuel II).

p. 29, §8.3 HASP — The text of this paragraph describes air monitoring that will be conducted at IR 14 and IR 9 landfill sites. This text is not applicable to this work being conducted at IR Site 08.